

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

INDICTMENT FOR WIRE FRAUD

FELONY

UNITED STATES OF AMERICA

* **CRIMINAL DOCKET NO.**

v.

* **SECTION:**

PAUL HUNTER

* **VIOLATION: 18 U.S.C. § 1343**

* * *

The Grand Jury charges that:

COUNT 1

A. AT ALL TIMES MATERIAL HEREIN:

1. Defendant, **PAUL HUNTER** (hereinafter “**HUNTER**”), owned and resided in a house located at 1112 North Bengal Road, Metairie, LA 70003 in the Eastern District of Louisiana. Before Hurricane Katrina, in 2005, defendant **HUNTER** purchased a building located at 6845 Jefferson Highway, Harahan, LA, 70123 in the Eastern District of Louisiana to open a business for his wife.

2. On August 29, 2005, Hurricane Katrina struck Louisiana and impacted the Jefferson Parish area.

3. As a result of damage to **HUNTER'S** properties, **HUNTER** applied to the Small Business Administration, (hereinafter "SBA"), an agency of the United States of America for two low interest disaster loans, one for his home and one for his business. The home loan was approved for \$19,500.00 and the business property loan was approved for \$49,600.00.

4. According to the SBA loan contracts, after the loan closing, SBA disbursed an initial \$10,000.00 on each loan. Further disbursements required the defendant to submit documents to the SBA, at 14925 Kingsport Road, Fort Worth, TX for approval. Additionally, the SBA loan contract required the borrower to assign any future insurance proceeds to SBA. Prior to disbursement of any loan funds in excess of \$10,000.00, the borrower must submit a copy of a valid building permit or written evidence from a property authority that a building permit was not required. The borrower must submit a written construction contract covering the cost of repairs/construction work satisfactory to SBA.

B. THE SCHEME AND ARTIFICE TO DEFRAUD

From on or about October 23, 2005 through on or about January 19, 2007, in the Eastern District of Louisiana, the defendant, **PAUL HUNTER**, devised a scheme and artifice to defraud and for obtaining money from the SBA by means of false and fraudulent pretenses and representations, to obtain approximately \$69,100.00 in loan proceeds and approximately \$61,000.00 in insurance proceeds.

It was part of the scheme and artifice to defraud that on or about May 11, 2006, the defendant transmitted a facsimile of a 2005 building permit issued to the defendant prior to Hurricane Katrina but altered by the defendant to appear as if it were issued after August 29, 2005 to the SBA to induce the SBA to release to the defendant the remaining amount of \$39,600.00 on his business loan.

It was further a part of the scheme and artifice to defraud that on or about July 24, 2006, the defendant transmitted a facsimile of a 2003 building permit falsely and fraudulently altered by the defendant to appear as if it were issued in 2005 to the SBA to induce the SBA to release to the defendant the remaining amount of \$9,500.00 on his home loan.

It was part of the scheme and artifice to defraud that on or about May 11, 2006, the defendant transmitted a facsimile of a 2005 building permit issued to the defendant prior to Hurricane Katrina but altered by the defendant to appear as if it were issued after August 29, 2005 to the SBA to induce the SBA to release to the defendant the remaining amount of \$39,600.00 on his business loan.

It was further a part of the scheme and artifice to defraud that the defendant failed to assign insurance proceeds to the SBA as required according to the two SBA loan agreements.

It was further part of the scheme and artifice to defraud that on or about April 27, 2006, the defendant received \$24,615.31 in insurance proceeds for repairs to his home that he did not assign or give over to the SBA as required by the SBA loan contract.

It was further part of the scheme and artifice to defraud that on or about September 1, 2006, the defendant received \$20,336.37 in insurance proceeds for repairs of his business that he did not assign or give over to the SBA as required by the SBA loan contract.

It was further part of the scheme and artifice to defraud that on or about January 19, 2007, the defendant received \$17,740.35 in insurance proceeds for repairs of his business that he did not assign or give over to the SBA as required by the SBA loan contract.

It was further part of the scheme and artifice to defraud during this period, the defendant used the loan proceeds to purchase a 2006 Cadillac STS car, a 2007 boat with a new outboard motor, a boat trailer, and new home.

C. THE WIRE FRAUD:

On or about May 11, 2006, in the Eastern District of Louisiana, the defendant, **PAUL HUNTER**, for the purpose of executing the scheme and artifice to defraud as alleged above in Paragraph B, did knowingly and wilfully transmit and cause to be transmitted in interstate commerce certain writings, signs, signals and sounds, by means of a wire communication from the Eastern District of Louisiana, specifically from Commander, Naval Reserve Forces Command (COMNAVRESFORCOM), Force Medical, Room 659, New Orleans, LA to the Small Business Administration's office at 14925 Kingsport Road, Fort Worth, TX; that is, a facsimile communication of a falsely and fraudulently altered building permit for 6845 Jefferson Highway, Harahan, LA 70123 to induce the Small Business Administration to release the remaining SBA business disaster loan balance of \$39,600.00 to the defendant; all in violation of Title 18, United States Code. Section 1343.

COUNT 2

1. Paragraphs A and B of Count 1 of this Indictment are hereby reincorporated by reference.

2. On or about May 13, 2006, in the Eastern District of Louisiana, the defendant, **PAUL HUNTER**, for the purpose of executing the scheme and artifice to defraud as alleged in Count 1, Paragraph B, did knowingly and wilfully cause to be transmitted in interstate commerce certain writings, signs, signals and sounds by means of wire communication from the United States Department of Treasury at 1650 65th Street, Emoryville, CA to the Whitney National Bank, located at 1201 Dickory Avenue, Harahan, LA in the Eastern District of Louisiana, that is, a wire transfer of

funds in the amount of \$39,600.00 to the Whitney National Bank, Account number 716151936 in the name of **PAUL HUNTER**; all in violation of Title 18, United States Code, Section 1343.

COUNT 3

1. Paragraphs A and B of Count 1 of this Indictment are hereby reincorporated by reference.

2. On or about July 24, 2006, in the Eastern District of Louisiana, the defendant, **PAUL HUNTER**, for the purpose of executing the scheme and artifice to defraud as alleged in Count 1, Paragraph B, did knowingly and wilfully transmit and cause to be transmitted in interstate commerce certain writings, signs, signals and sounds, by means of a wire communication from the Eastern District of Louisiana, specifically from Commander, Naval Reserve Forces Command (COMNAVRESFORCOM), Force Medical, Room 659, New Orleans, LA to the Small Business Administration's office at 14925 Kingsport Road, Fort Worth, TX; that is, a facsimile communication of a falsely and fraudulently altered building permit for 1112 North Bengal Road, Metairie, LA 70123 to induce the Small Business Administration to release the remaining SBA home disaster loan balance of \$9,500.00 to the defendant; all in violation of Title 18, United States Code. Section 1343.

COUNT 4

1. Paragraphs A and B of Count 1 of this Indictment are hereby reincorporated by reference.

2. On or about July 29, 2006, in the Eastern District of Louisiana, the defendant, **PAUL HUNTER**, for the purpose of executing the scheme and artifice to defraud as alleged in Count 1, Paragraph B, did knowingly and wilfully cause to be transmitted in interstate commerce certain writings, signs, signals and sounds by means of wire communication from the United States

Department of Treasury at 1650 65th Street, Emoryville, CA to the Navy Federal Credit Union, located at 9850 Highway 23, Belle Chasse, LA, in the Eastern District of Louisiana, that is, a wire transfer of funds in the amount of \$9,500.00 to the Navy Federal Credit Union, Account number 2802485702 in the name of **PAUL HUNTER**; all in violation of Title 18, United States Code, Section 1343.

A TRUE BILL:

FOREPERSON

JIM LETTEN
United States Attorney
LA Bar Roll No. 8715

JAN MASELLI MANN
First Assistant United States Attorney
LA Bar Roll No. 9020

ANDRE' JONES
Assistant United States Attorney
LA Bar Roll No. 23502

New Orleans, LA
January 18, 2008